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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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FILE NO: 46001.000278

July 27, 2001

By Hand

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *WorldCom, Cox, and AT&T ads. Verizon*
CC Docket Nos. 00-218, 00-249, and 00-251

Dear Ms. Salas:

Enclosed for filing on behalf of Verizon, please find four copies of Verizon's Objections to AT&T's Eighth Set of Data Requests.

Please do not hesitate to call me with any questions.

Very truly yours,

Kimberly Newman / cwc

Kimberly A. Newman

cc: Dorothy T. Attwood (8 copies)(by hand)
David Levy, Esq.
Mark A. Keffer, Esq.

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
Petition of WorldCom, Inc. Pursuant)	
to Section 252(e)(5) of the)	
Communications Act for Expedited)	
Preemption of the Jurisdiction of the)	CC Docket No. 00-218
Virginia State Corporation Commission)	
Regarding Interconnection Disputes)	
with Verizon Virginia Inc., and for)	
Expedited Arbitration)	
)	
In the Matter of)	
Petition of Cox Virginia Telecom, Inc.)	
Pursuant to Section 252(e)(5) of the)	
Communications Act for Preemption)	CC Docket No. 00-249
of the Jurisdiction of the Virginia State)	
Corporation Commission Regarding)	
Interconnection Disputes with Verizon)	
Virginia Inc. and for Arbitration)	
)	
In the Matter of)	
Petition of AT&T Communications of)	
Virginia Inc., Pursuant to Section 252(e)(5))	CC Docket No. 00-251
of the Communications Act for Preemption)	
of the Jurisdiction of the Virginia)	
Corporation Commission Regarding)	
Interconnection Disputes With Verizon)	
Virginia Inc.)	

**VERIZON VIRGINIA INC.'S OBJECTIONS
TO AT&T'S EIGHTH SET OF DATA REQUESTS**

In accordance with the Procedures Established for Arbitration of Interconnection Agreements Between Verizon and AT&T, Cox and WorldCom, CC Docket Nos. 00-218, 00-249, 00-251, DA 01-270, Public Notice (CCB rel. February 1, 2001), Verizon Virginia Inc. ("Verizon") objects as follows to the Eighth Set of Data Requests served on Verizon by AT&T Communications of Virginia ("AT&T") on July 24, 2001.

GENERAL OBJECTIONS

1. Verizon objects to AT&T's Data Requests to the extent that all or any of them seek confidential business information covered by the Protective Order that was adopted and released on June 6, 2001. Such information will be designated and produced in accordance with the terms of the Protective Order.

2. Verizon objects to AT&T's Data Requests to the extent that all or any of them seek attorney work product or information protected by the attorney-client privilege.

3. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information that is neither relevant to this case nor likely to lead to the discovery of admissible evidence, or otherwise seek to impose upon Verizon discovery obligations beyond those required by 47 CFR § 1.311 et seq.

4. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information from independent corporate affiliates of Verizon Virginia Inc., or from board members, officers or employees of those independent corporate affiliates, that are not parties to this proceeding.

5. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information relating to operations in any territory outside of Verizon Virginia Inc. territory.

6. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek discovery throughout the Verizon footprint. This proceeding involves only Verizon Virginia Inc. and relates only to the terms of interconnection and resale in Virginia. Moreover, as the Commission has assumed the jurisdiction of the Virginia State Corporation Commission in this matter, it has no jurisdiction over Verizon entities that do not conduct business in Virginia. See Memorandum Opinion and Order, In the Matter of Petition of AT&T Communications of Virginia, Inc. for Preemption Jurisdiction of the Virginia State Corporation Commission Pursuant to Section 252(E)(5) of the Telecommunications Act of 1996, CC Docket No. 00-251 (January 26, 2001).

7. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information that is confidential or proprietary to a customer, CLEC or other third party. Verizon has an obligation to safeguard such information from disclosure. Thus, while Verizon may be in possession of such information, it does not have the authority to disclose that information to AT&T or any other entity.

8. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, are redundant of prior data requests served by AT&T.

SPECIFIC OBJECTIONS

In addition to the foregoing General Objections and without waiver of same,

Verizon objects specifically to AT&T's Data Requests as follows:

ITEM: AT&T 8-1 In its Response to Issue V-7, filed May 31, 2001, Verizon stated "If the order is relatively simple and does not require any network reconfigurations, the interval will reflect the complexity of work to be done and will be completed in a short interval. If the order is complex, depending on the work required the interval will be longer." Please describe in detail the specific types of "network reconfigurations" which might be involved with a request solely to port 200 or more telephone numbers, without unbundled loops.

REPLY: See General Objections.

VZ VA #232

ITEM: AT&T 8-2 During off-hours and weekends, specifically state whether Verizon dispatches field technicians to customer premises and/or to central offices to provide installation, repair, and/or maintenance for

- a. residential end users
- b. small business customers
- c. large business customers

REPLY: See General Objections.

VZ VA #233

ITEM: AT&T 8-3 Describe in detail the repair and maintenance staff that Verizon maintains during off-hours and weekends, including, but not limited to, the types of personnel at work and/or on call, the locations where those personnel work or are called into work, if needed.

REPLY: See General Objections.

VZ VA #234

ITEM: AT&T 8-4 When AT&T informs Verizon during business hours on a weekday that a port will not occur as scheduled, detail the work effort that Verizon undertakes to insure that the end user's telephone number is not removed from Verizon's switch that night at 11:59 pm. As part of the response, please be sure to include the following:

- a. how many technicians are involved in the effort;
- b. the specific tasks that need to be performed;
- c. the average time that it takes to complete the entire work effort (to the nearest 15 minute increment); and
- d. where this work is typically performed, e.g. central office, network operations center, or other location.

REPLY: See General Objections.

VZ VA #235

ITEM: AT&T 8-5 In light of the response to 4, is there any reason why the work effort would take longer or require more technician involvement during off-hours or on a weekend? If so, describe in detail the additional work effort or involvement required.

REPLY: See General Objections.

VZ VA #236

ITEM: AT&T 8-6 Does number portability, without an unbundled loop, require dispatch of a field technician to the central office where the switch that contains the customer's telephone number is located or to any location? If so, specifically state the type of location to which the technician is dispatched and the reason therefore.

REPLY: See General Objections.

VZ VA #237

ITEM: AT&T 8-7 Describe in detail the process that a Verizon representative uses to schedule the installation of local exchange service for residential customers on a Saturday, including but not limited to an identification of the operation support systems used, whether those systems accept a Saturday due date, and, if available, the particular USOC(s) entered to permit the scheduling of a Saturday due date.

REPLY: See General Objections.

VZ VA #238

ITEM: AT&T 8-8 Describe in detail the process that a representative of a CLEC reselling Verizon service uses to schedule the installation of local exchange service for residential customers on a Saturday, including but not limited to an identification of the operation support systems used, whether those systems accept a Saturday due date, and, if available, the particular USOC(s) entered to permit the scheduling of a Saturday due date.

REPLY: See General Objections.

VZ VA #239

Respectfully submitted,

Karen Zacharia / by . . .
permission
CWC

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Dated: July 27, 2001

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CERTIFICATE OF SERVICE

I do hereby certify that true and accurate copies of the foregoing Objections to AT&T's Eighth Set of Data Requests were served electronically and by overnight mail this 27th day of July, 2001, to:

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Constance Corry